

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRYCE MARTINEZ,

Plaintiff,

v.

THE KRAFT HEINZ COMPANY; THE KRAFT HEINZ FOODS COMPANY; MONDELEZ INTERNATIONAL, INC.; POST HOLDINGS, INC.; THE COCA-COLA COMPANY; PEPSICO, INC.; GENERAL MILLS, INC.; NESTLE USA, INC.; KELLANOVA; WK KELLOGG CO.; MARS INCORPORATED, INC.; CONAGRA BRANDS, INC.,

Defendants.

Case No. 2:25-cv-00377

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL OF EXPRESS WARRANTY CLAIM**

Pursuant to FED. R. CIV. P. 41(a)(1)(A) and (B), Plaintiff Bryce Martinez hereby gives notice of his intent to dismiss his express warranty claim (Count IV) asserted against all Defendants in the above-captioned matter, without prejudice.

Dated: May 30, 2025

Respectfully submitted,

**MORGAN & MORGAN**

By: /s/ Rene F. Rocha, Esq.  
RENE F. ROCHA, ESQ.\*  
LA Bar No. 34411  
**MORGAN & MORGAN, COMPLEX  
LITIGATION GROUP**  
400 Poydras Street, Suite 1515  
New Orleans, LA 70130  
[rrocha@ForThePeople.com](mailto:rrocha@ForThePeople.com)  
T: (954) 318-0268  
F: (954) 327-3018

/s/ Josh Autry, Esq.  
JOSH AUTRY, ESQ.  
PA Bar No. 208459

KY Bar No. 98419  
TN Bar No. 41623  
NY Bar No. 6161962  
**MORGAN & MORGAN, P.A.**  
199 Water Street, Suite 1500  
New York, NY 10005  
[jautry@ForThePeople.com](mailto:jautry@ForThePeople.com)  
T: (859) 899-8785

K. CLANCY BOYLAN, ESQ.  
PA Bar No. 314117  
**MORGAN & MORGAN, P.A.**  
2005 Market Street, Suite 350  
Philadelphia, PA 19103  
[cboylan@ForThePeople.com](mailto:cboylan@ForThePeople.com)  
T: (215) 446-9795  
F: (215) 446-9799

T. MICHAEL MORGAN, ESQ.\*  
FL Bar No. 62229  
**MORGAN & MORGAN, P.A.**  
20 N. Orange Ave., Suite 1600  
Orlando, FL 32801  
[mmorgan@ForThePeople.com](mailto:mmorgan@ForThePeople.com)  
T: (407) 418-2031  
F: (407) 245-2284

CHRISTOPHER A. SEEGER, ESQ.\*\*  
NJ Bar No. 042631990  
PARVIN K. AMINOLROAYA, ESQ.\*\*  
NJ Bar No. 028492008  
**SEEGER WEISS LLP**  
55 Challenger Road  
Ridgefield Park, NJ 07660  
[cseegeer@seegerweiss.com](mailto:cseegeer@seegerweiss.com)  
[paminolroaya@seegerweiss.com](mailto:paminolroaya@seegerweiss.com)  
T: (212) 584-0700  
F: (212) 584-0799

FRAZAR THOMAS, ESQ.  
PA Bar No. 325478  
DAVE BUCHANAN, ESQ.  
PA Bar No. 320392  
**SEEGER WEISS LLP**  
325 Chestnut Street  
Suite 917

Philadelphia, PA 19106  
[fthomas@seegerweiss.com](mailto:fthomas@seegerweiss.com)  
[dbuchanan@seegerweiss.com](mailto:dbuchanan@seegerweiss.com)  
T: (973) 639-9100  
F: (973) 679-8656

FRANK PETOSA, ESQ.\*  
FL Bar No. 972754  
**MORGAN & MORGAN COMPLEX  
LITIGATION GROUP**  
8151 Peters Road  
Suite 4000  
Plantation, FL 33324  
[fpetosa@ForThePeople.com](mailto:fpetosa@ForThePeople.com)  
T: (954) 318-0268  
F: (954) 327-3018

*Attorneys for Plaintiff*

*\*Admitted Pro Hac Vice*  
*\*\*Pending Admission Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2025, the foregoing was served via the Court's ECF system on all counsel of record.

*/s/ Rene F. Rocha, Esq.*  
RENE F. ROCHA, ESQ.